REMARKS

The Office Action of June 5, 2006 has been received and its contents carefully considered. ·

The Office Action rejects all of the claims for obviousness on basis of US patent 6,476,858 to Diaz et al (hereafter simply "Diaz" for the sake of convenient discussion). For the reasons discussed below, however, it is respectfully submitted that the claims are patentable over this reference.

The place to begin is with the "Response To Remarks" section on pages 16 and 17 of the Office Action. Here, the Examiner takes the position that the arrows in Figure 7 of Diaz indicate that data flows not only from the field terminals to the view stations, but also from the view stations to the field terminals.

Figure 7 of Diaz shows various computers which are connected to a network that supports Internet TCP/IP protocol (column 4, lines 39-53). The computers that are linked by this network include a web browser terminal 6, a beeper host computer 7, and an Internet mail server 8. They also include what the reference calls VS clients 1a to 1d, VS servers 3a and 3b, and VS remote consoles 5a and 5b. The reference states that images may be sent to the VS servers or to the VS remote consoles (column 6, lines 8-10) and also mentions a VS server option (column 6, line 35). Other than these brief mentions, though, Diaz says nothing about the purpose or operation of his VS servers and remote consoles. The reference does not even say what "VS" stands for (virtual server?).

However, it is likely that a person who was ordinarily skilled in this art would be aware of the concept of virtual IP addressing. Different clients have their own virtual IP

addresses, and these addresses reside on a server as though the server had the multiple IP addresses. It is therefore seems likely that ordinarily skilled person would conclude that the VS servers and VS remote consoles in Figure 7 of the reference participate in conveying information from the VS clients 1a-1d over the Internet.

Which brings us now to the arrows in Figure 7 of the reference. The reference advises that the user can be notified by a beeper or a pager that image information has been sent by e-mail, and the user can then retrieve the image information (column 6, lines 23-34). An ordinarily skilled person would realize that, in order to download an e-mailed image from the Internet mail server 8 in Figure 7 of the reference, the user must address the Internet mail server 8 and must also send information for logging onto the user's e-mail account. Similarly, an ordinarily skilled person would likely conclude that the virtual IP address of one of the VS clients 1a-1d in Figure 7 must be sent from Diaz's web browser terminal 6 to a VS server in order to retrieve images when Diaz's "VS server option" as used.

An ordinarily skilled person would therefore understand that IP address information and possibly also other information (such as information for logging onto an e-mail account) must necessarily be sent from a view station in the Diaz reference. However, independent claim 15 provides that control information that is originated at a view station is sent to the field terminals, and independent claim 23 is similar. This permits the field terminals to be controlled in a host-slave mode. The Diaz reference says <u>absolutely nothing</u> about sending control information from a view station to a field terminal. The mere presence of arrows in both directions in Figure 7 of Diaz would <u>not</u> have suggested sending control information from a view station to field terminals, because an ordinarily skilled person would expect other
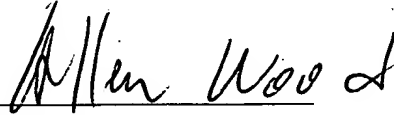
types of information to flow both ways in a TCP/IP network of the type shown in Diaz's Figure 7.

Independent claim 15 also provides that data is transmitted between interface units and field terminals as E1 frames via E1 channels, that a network interface is coupled to an Ethernet data network, and that an information process kernel organizes data for transmission between the channel interface units and the network interface. An ordinarily skilled person would know that an E1 channel is a telephone-type link, while Figure 8a of Diaz indicates that Diaz's cameras are connected to his VS client by coaxial cables. Furthermore, nothing in Diaz's Figure 7 would suggest an Ethernet network. It is respectfully submitted that Diaz would not have suggested, to an ordinarily skilled person, connecting field terminals to telephone-type links, connecting a view station to an Ethernet data network, and interfacing between the telephone-type links and the Ethernet data network.

The remaining claims depend from the independent claims discussed above and recite additional limitations to further define the invention. There are therefore patentable along with their independent claims. It is nevertheless noted that dependent claims 30 and 31 proved that audio data is sent to the field terminals. This feature would permit a watchman to tell an intruder at a field terminal that the police will be called if the intruder does not leave immediately, for example. Or instructions could be given to emergency personnel present at a field terminal. There is no suggestion, in Diaz, of sending audio data to Diaz's field terminals. Despite the comments in section 15 of the Office Action, the arrows in Figure 7 of the reference would not have suggested sending audio data, for the reasons discussed above.

For the foregoing reasons it is respectfully submitted that this application is now in condition for allowance. Reconsideration of the application is therefore respectfully requested.

Respectfully submitted,

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